

FILED

APR 23 2002

CLERK, U.S. DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA
BY *[Signature]* DEPUTY CLERK

1 JOHN K. VINCENT
2 United States Attorney
3 MARK L. KROTOSKI
4 S. ROBERT TICE-RASKIN
5 Assistant U.S. Attorneys
6 501 I Street, Suite 10-110
7 Sacramento, California 95814
8 Telephone: (916) 554-2822
9

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF CALIFORNIA

10 UNITED STATES OF AMERICA,) CR S
11 Plaintiff,) VIOLATION: 18 U.S.C. §§ 2,
12 v.) 1344(2) - Bank Fraud; Aiding
13) and Abetting
14 JAMES WALKER WATSON, JR.,)
15 Defendant.)
16 _____

CRS-02-0160WBS

I N F O R M A T I O N

16 The United States Attorney charges:

17 JAMES WALKER WATSON, JR.,

18 defendant herein, as follows:

19 I. INTRODUCTION

20 1. Between approximately 1999 and 2001, defendant JAMES
21 WALKER WATSON, JR. served as the principal organizer of the
22 Sacramento Jazz Festival.

23 2. The Sacramento Jazz Festival used bank accounts at U.S.
24 Bank under the name of Society of Performing Jazz Festivals, Inc.

25 II. THE SCHEME TO DEFRAUD

26 3. Beginning at a time unknown, but not later than on or about
27 June 14, 2001, and continuing thereafter up to and including
28 September 2001, in the State and Eastern District of California,

1 defendant JAMES WALKER WATSON, JR., devised, executed, and attempted
2 to execute, a scheme and artifice to obtain the moneys and funds
3 owned by, and under the custody and control of U.S. Bank, a
4 federally insured financial institution, by means of material false
5 and fraudulent pretenses, representations, and promises. As a
6 result of the scheme, the loss to U.S. Bank is approximately
7 \$149,837.24.

III. WAYS AND MEANS

9 In furtherance of the scheme and artifice set forth above,
10 defendant JAMES WALKER WATSON, JR. employed, among others, the
11 following ways and means:

12 4. It was part of the scheme and artifice to defraud that
13 defendant JAMES WALKER WATSON, JR. requested that his mother provide
14 him with three checks totaling \$150,000 made payable to the Society
15 of Performing Jazz Festivals, Inc., knowing she did not have
16 sufficient funds in her checking account to cover the checks.

17 5. It was part of the scheme and artifice to defraud that
18 defendant JAMES WALKER WATSON, JR. deposited the three checks of his
19 mother into U.S. Bank accounts of the Society of Performing Jazz
20 Festivals, Inc., knowing there were insufficient funds to cover the
21 deposited checks.

22 6. It was part of the scheme and artifice to defraud that
23 defendant JAMES WALKER WATSON, JR. falsely represented to bank
24 officials that there were adequate funds to cover the three checks
25 of his mother which he deposited into the U.S. Bank.

26 7. It was part of the scheme and artifice to defraud that
27 defendant JAMES WALKER WATSON, JR., after depositing the checks and
28 assuring bank officials that there were adequate funds to cover the

checks, withdrew approximately \$150,000 in the form of cashier's checks and cash.

8. It was further a part of the scheme that defendant JAMES WATSON JR. falsely represented to U.S. Bank officials that he would repay the bank with funds he was expecting to receive from pending divorce proceedings between his parents, to prevent or delay bank officials from demanding the money back and/or complaining to law enforcement authorities.

IV. BANK FRAUD TRANSACTIONS

9. On or about July 13, 2001, for the purposes of executing the scheme and artifice to defraud and attempting to do so, defendant JAMES WALKER WATSON, JR., deposited a check into the U.S. Bank account for the Society of Performing Jazz Festivals, Inc. which was drawn on his mother's Bank of America account in the amount of \$60,000. On or about the same date, defendant JAMES WALKER WATSON, JR. withdrew a comparable amount from the U.S. Bank account, all in violation of Title 18, United States Code, Sections 2, 1344(2).

Dated: April 23, 2002

JOHN K. VINCENT
United States Attorney

By:

MARK E. KROTKOSKI
Assistant U.S. Attorney

S. ROBERT TICE-RASKIN
Assistant U.S. Attorney